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Philip Giudice, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA. 02114

Subject: Reply comments on Class I RPS

Dear Commissioner Giudice:

Ansar Energy, LLC thanks the Department of Energy Resources (the "Department") for the opportunity to submit reply comments on the Renewable Portfolio Standard ("RPS") of the Green Communities Act (the "Act"). As a principal of Ansar Energy, I have over thirty years of experience with the electric power industry in the US and overseas. I have reviewed the Class I comments and wish to concur wholeheartedly with those offered by SunEdison and offer the following comments for your consideration.

The Green Community Act provides an historic opportunity for the Commonwealth of Massachusetts to develop not only clean renewable energy at an affordable price, but also set up the industry infrastructure, including a spectrum of green jobs in Massachusetts for long term growth of the solar industry. One of the goals of the Act is to support clean, renewable energy while creating jobs in Massachusetts in the solar PV industry. The Commonwealths' goal for 250 MW's of solar by 2017 is an unprecedented starting point. However, in order to thrive, the solar PV power industry supply chain must be supported by an investment of significant size and assurances that the Commonwealth will enforce these long term market objectives.

Massachusetts is competing with other states and countries to attract investors and developers. Based on the successful experience of other states such as New Jersey, Maryland, California and other countries such as Germany and Spain, I would recommend that the Commonwealth's goal be 3% of electric retail sales from solar energy. This level of solar energy implementation is likely to lead to billions of dollars of investment across the entire PV industry supply chain, thus creating thousands of "green" jobs.

I believe that looking at a historical perspective on renewable energy in the United States and abroad is helpful in seeking a guideline to be used by DOER in implementing the Renewable Portfolio Standard in the most efficient way possible and to provide the best outcome for the Commonwealth. In 1978, in response to the oil price spike earlier in the decade, the United States made bold moves to jump start renewable energy sources and increased efficiency by implementing the Public Utility Regulatory Policies Act ("PURPA"). As a result of PURPA there were many technological innovations in California, particularly in renewable energy projects. Subsequent to PURPA legislation, California fostered the practice

of the "standard offer" contract which were based on utility avoided costs and projected energy costs in the future. A very broad base of solar, wind and biomass power projects were developed in California as a result of these standard offers. These projects brought billions of dollars of investment and jobs to California.

Germany used the successful experience of the California standard offer and enacted their own program to promote solar power starting in the mid 1990s. They based their program on a 'feed in tariff', which is essentially a standard offer. Germany has implemented a strategic plan to promote solar PV power, with grid penetration commonly in the 20% range and in a manner that has a low cost impact to consumers. They have grown the solar industry to an impressive scale by facilitating many billions of dollars in investment in factories and facilities throughout the supply chain and in the process created thousands of jobs. (Please see the following for a reference: **www.solarelectricpower.org/docs/Germany%20summary%20report.pdf**).

Massachusetts, in my opinion, can be the leader in the renewable energy market for the east coast, especially in the field of solar PV. In addition to the Commonwealth's goal of 250 MW of solar energy, a unique opportunity exists to go beyond that goal. Permitting in the Commonwealth can be a much faster process for solar, than for other renewable technologies. At this time, in view of the financial crisis that is facing our commonwealth and our nation, the Act should be the vehicle to promote investment and create a wide spectrum of jobs facilitating growth in our economy while promoting an industry destined to play a major role in our future.

Thus, I suggest and note the following:

- The implementation of a solar specific RPS necessary to meet the intent of the Act. The solar specific RPS should be 3% of the total retail electric sales in the Commonwealth by 2020 at financeable rates (expected to be between $400/MWhr to $600/MWhr). Please note that at least twelve other states in the US have solar specific RPS. These range from 4% in New Mexico, approximately 2% in New Jersey, Maryland and Delaware. The solar radiation in Massachusetts is similar to the solar radiation in the eastern states mentioned above, and much higher than in Germany which has significantly higher solar energy targets.

- The impact on the retail tariff and the electric bill to the consumer is expected to be less than 2% by implementation of the suggested solar specific RPS. In fact if the natural gas pricing increase by more than about 3% annually, the increase in the average bill would be even lower. After about 10 years, the increased solar electric power component in the commonwealth's electric supply mix for expensive peak power may in fact be a moderating influence on future rate increases.

- A 3 % of retail electric sales would represent a capacity of almost 1,500 MWs of solar power projects and would represent a total investment of over $11 billion. This multibillion dollar investment in solar PV power projects in the Commonwealth over the span of a decade or so will allow for much more growth of the PV power project

supply chain with potential significant additions of a broad spectrum of green jobs including:

- Silicon purification and wafer processing plants
- Solar manufacturing and installation jobs
- White collar jobs in the legal, financial and engineering industries
- Solar research in the Commonwealth's colleges and universities

The PV Solar power industry is unique in its ability to assist the Commonwealth to grow an entire knowledge-based industry, end to end, that will not only serve the citizens of the Commonwealth, but also export the product and services to other states in the US and to countries abroad which are also demanding clean, renewable affordable energy.

Thank you again for the opportunity to provide the Department with these reply comments. If you have any questions, please do not hesitate to contact me.

Regards,

Junaid Yasin
President